

EXHIBIT F

Holbrook, Bryan

From: Holbrook, Bryan
Sent: Wednesday, July 21, 2021 3:47 PM
To: Nicole Edwards; Blake Edwards
Cc: Klass, David
Subject: Meet and Confer re: 30(b)(6) Topics

Importance: High

Blake and Nicole,

Good afternoon. This email is to confirm David's offer, as required under Judge Manasco's Order entered on 7/19/21, to discuss resolution of the outstanding issues related to the Rule 30(b)(6) deposition while counsel were together at mediation. The Order is embedded here:

07/19/2021	49	TEXT ORDER- This case is before the court on Defendant's motion for leave to file a motion to compel. Doc. 48 . It appears that the dispute underlying the motion may still be amenable to resolution in whole or in part by agreement of counsel at mediation on July 21, 2021, if it has not already been so resolved. If the dispute is not resolved at mediation, Defendant may file a motion to compel by 5:00 p.m. on July 22, 2021, and Plaintiff's response will be due by 5 p.m. on July 26, 2021. If such motion is filed, the discovery deadline will be extended by 14 days for the sole purpose of taking the deposition(s) at issue. Signed by Judge Anna M Manasco on 7/19/21. (MRR,) (Entered: 07/19/2021)
------------	----	---

You refused to confer with David and indicated you would get back to us. We believe this is a clear violation of your duty under the Order to meet and confer with us further if the case was not resolved at mediation and will be noting as much in our motion tomorrow. David is now driving back from Alabama, and I will be leaving for the airport shortly to prepare Mr. Fernandez for his deposition, so we need to know your position immediately. If we do not hear from you by 5pm, **Eastern Standard Time**, we will be seeking our associated costs in our motion given your refusal to confer with us as required by the Court's Order.

Thanks,

Bryan



Bryan Holbrook

Attorney at Law

Fisher & Phillips LLP

227 West Trade Street | Suite 2020 | Charlotte, NC 28202

bholbrook@fisherphillips.com | O: (704) 778-4173 C: (540) 230-2398 | [in](#) [tw](#)

[vCard](#) | [Bio](#) | [Website](#) **On the Front Lines of Workplace LawSM**

This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error, then immediately delete this message.